

**ARIZONA DEPARTMENT OF ADMINISTRATION  
ASBESTOS INSPECTION / MANAGEMENT PLAN**

**RTC - AGRICULTURE LAB  
Building #: CG 1 015 - 0010  
2422 WEST HOLLY  
Phoenix, Arizona**

**Submitted By:  
Environmental Management Consultants, Inc.  
02/02/99**



7342 E. THOMAS RD. / SCOTTSDALE, ARIZONA 85251-7216 / 602-990-2069 / FAX 602-990-8468  
emclab@earthlink.net

**Date:** 02/02/99

**Client(s):** AZ Department of Administration  
General Services Division / Building and Planning Services  
15 South 15th Avenue, Suite 101  
Phoenix, AZ 85007

**Attention:** Jean McKinney, Project Manager  
Telephone : (602) 542-0070  
Facsimile : (602) 542-3858

**Subject:** Environmental Inspection  
Capitol Group Buildings  
RTC - AGRICULTURE LAB  
Building #: CG 1 015 - 0010  
2422 WEST HOLLY  
Phoenix, Arizona  
EMC Project # 3297

Dear Jean:

Environmental Management Consultants, Inc. is pleased to submit this report for an Asbestos Containing Materials (ACM) inspection conducted at the above referenced site. Our services included the inspection and bulk sampling of suspect building materials for the presence of asbestos.

Bulk samples were analyzed by Polarized Light Microscopy (PLM) in our AIHA accredited laboratory. This report includes the suspect materials observed and sampled in each area, laboratory analysis results, summary of ACM, and recommendations based on the findings of our inspection.

Environmental Management Consultants, Inc. appreciates the opportunity to have provided these services to you. If there are any questions concerning this report or if we may assist you on future projects, please contact me at (602) 990-2069.

Sincerely,

Environmental Management Consultants, Inc.

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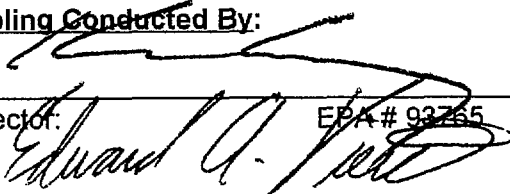
## INSPECTION INFORMATION

**Client(s) :** Arizona Department of Administration  
General Services Division  
Building and Planning Services  
15 South 15th Avenue, Suite 101  
Phoenix, AZ 85007

**Property / Building:** RTC - AGRICULTURE LAB  
Building #: CG 1 015 - 0010  
2422 WEST HOLLY  
Phoenix, Arizona

### Inspection and Bulk Sampling Conducted By:

Kendall Earley:

Inspector:  EPA # 93765 (Exp. 10/27/99)

Edward Vierno:

Inspector: EPA # 92041 (Exp. 05/04/99)

Management Planner: EPA # 92041 (Exp. 05/04/99)

**Date of Inspection:** 02/02/99

### SCOPE OF WORK:

At the request of the client, an inspection was performed at the above referenced site to determine the presence, if any, of Asbestos Containing Materials (**ACM**). This report documents observations during the inspection along with test and laboratory results taken at this facility.

**Included Areas :** Interior, Exterior, and Mechanical Areas;

**Excluded Material(s) :**

1. Roofing Materials & Products including roof membranes, tile, mastic, flashing, etc.;
2. Fire Doors / Frames including Vault Doors
3. Decorative Tile and Mastic - Includes Marble, Ceramic, and Terrazzo systems.

**Excluded Areas :** Inaccessible areas - Wall interiors, enclosed spaces, etc.

### BUILDING DESCRIPTION :

**Building Function:** Office building.  
**Number of Floors:** Single story structure.  
**Building Size:** Approximately 23,000 square feet.  
**Construction Year:** 1968

## INSPECTION PROCEDURES

RTC - AGRICULTURE LAB  
Building #: CG 1 015 - 0010

### DESCRIPTION OF INSPECTION:

During this inspection, a complete visual inspection was performed to acquaint the inspector(s) with the general layout of the facility. The accessible areas were inspected on a room-by-room basis to identify any suspect materials that may contain asbestos. For sampling / testing purposes, suspect materials are grouped as "Homogeneous Areas (HA)". For a list of materials observed at this facility, see **Section 3 : List of Homogeneous Areas**. A Homogeneous Area is defined as a building material of the same type, style, and composition which were used in the same manner.

Representative bulk samples were taken in random / convenience fashion for each suspect material. These samples were given individual numbers and recorded on collection sheets for future reference, see **Section 4, Sample Collection Forms**.

Bulk samples were submitted and analyzed by Polarized Light Microscopy (PLM) in a AIHA accredited laboratory to determine which, if any, contain asbestos. Sample results were cross referenced to the locations in which they were taken to determine which areas of this facility have Asbestos Containing Materials (ACM). For a list of materials found to contain asbestos, see **Section 5, Summary of Asbestos Containing Materials**.

All of the ACM materials were determined to be either friable or non-friable by touch. A material is considered **friable** if when dry, it may be crumbled, pulverized, or reduced to powder by hand pressure. According to EPA standards (NESHAP - 40 CFR 61, Subpart M), these materials are considered **Regulated Asbestos Containing Materials (RACM)** and have a high probability of becoming airborne during renovation and / or demolition.

The EPA (NESHAP - 40 CFR 61, Subpart M) considers a material **non-friable** if, when dry, it **can not** be crumbled, pulverized, or reduced to powder by hand pressure. These materials are considered **Non Regulated Asbestos Containing Materials (non-RACM)** because they historically will not become friable during renovation and / or demolition and have limited probability of releasing airborne fibers.

For material classifications, conclusions and recommended response actions, see **Section 6, Conclusions / Recommendations**. For general information, worker guidelines, safety, etc. when dealing with the asbestos containing materials, refer to the Operations & Maintenance Plan (O&M) for this facility.

This inspection was conducted in a non-aggressive manner. No destructive means were used to gain access to inaccessible spaces such as duct chases, wall interiors, and areas above solid ceilings, etc. During any renovation / demolition activities, personnel should always be aware and alert for any ACM suspect material that may be hidden.

## LIST OF HOMOGENEOUS AREAS - ASBESTOS

### **RTC - AGRICULTURE LAB Building #: CG 1 015 - 0010**

During the Asbestos Survey, a complete visual inspection was performed to acquaint the inspector(s) with the general layout of each affected area. The following homogeneous areas were identified. These areas represent building materials of the same type, style, and composition which were used in a similar manner.

**Abbreviations Used:** HA - Homogeneous Area; TSI - Thermal System Insulation; SM - Surfacing Material; MISC - Miscellaneous Material; sf - Square Feet; lf - Lineal feet; F - Friable; NF - Non-friable; ACM - Asbestos Containing Material;

- HA 01 :**      **MISC / NF      Drywall Systems (Drywall / Compound) - approx. 56,000 sf.**  
Located throughout the facility on various wall / ceiling surfaces.
- HA 02 :**      **MISC / F      2' x 4' Ceiling Panels - approx. 11,500 sf.**  
Located in First Aid Room, Women's Room 4, Storage Room 2, Grinding Room, Dairy Residue, Formulation's Lab, Media Prep. Room, Clean Room, Animal Disease Lab, Utility Room, Nematode Lab, Bio Lab 2, Office 4, Beehive, Bio Lab 1, Wash Room, and Micro Lab.
- HA 03 :**      **MISC / F-NF      1' x 1' Ceiling Tiles / Mastic - approx. 2,000 sf.**  
Located in Chemical Library, Reception Area, Halls 1 - 3, Office 2, Office 3, and Conference Room.
- HA 04 :**      **MISC / NF      Carpet Mastic - approx. 1,300 sf.**  
Located in Offices 2 - 4, Office 7, Beehive, and Conference Room.
- HA 05 :**      **MISC / NF      12x12 Beige Floor Tile / Mastic - approx. 45 sf.**  
Located in Women's Room 2.
- HA 06 :**      **MISC / NF      12x12 White Floor Tile / Mastic - approx. 2,200 sf.**  
Located in Chemical Library, Reception Area, Halls 1 - 2, Bio Lab 2, Office 6, Men's Room 2, Women's Room 3, Men's Room 1, and Women's Room 1.
- HA 07 :**      **MISC / NF      9x9 White Floor Tile / Mastic - approx. 45 sf.**  
Located in Women's Room 2, under 12x12 Beige Floor Tile.
- HA 08 :**      **MISC / NF      Residual Black Floor Mastic - approx. 900 sf.**  
Located in Bio Lab 2 under rubber membrane flooring material. Assumed under 12x12 Floor Tile in this room and under all areas / rooms where rubber membrane floor exists. Areas with rubber membrane flooring should be verified prior to renovations / removal.

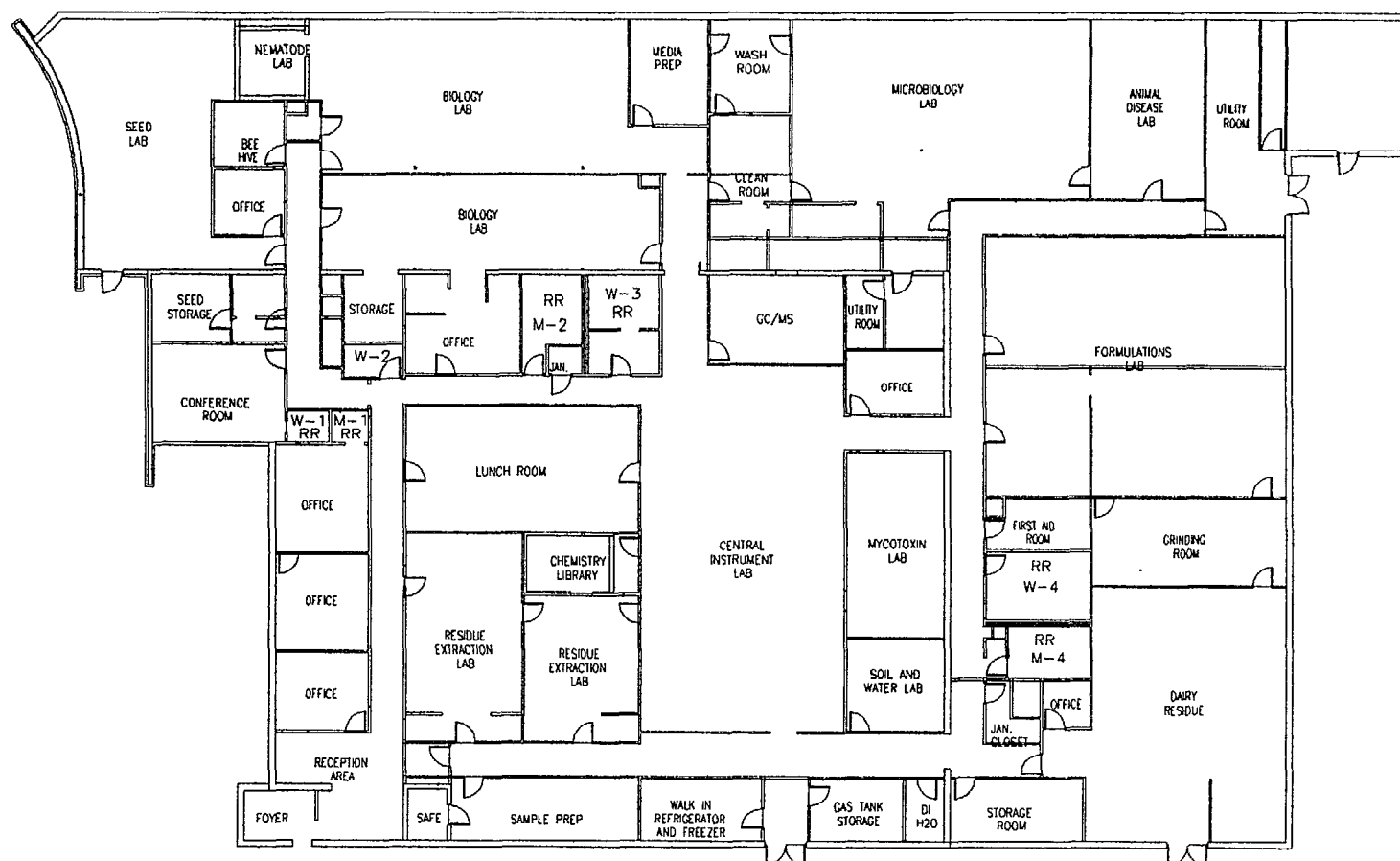
**LIST OF HOMOGENEOUS AREAS - ASBESTOS**

(Continued)

**RTC - AGRICULTURE LAB  
Building #: CG 1 015 - 0010**

- HA 09 :**      **MISC / NF      Yellow Baseboard Adhesive - approx. 750 lf.**  
Located in Media Prep. Room, Hall 1, Closet 2, Storage Room 1, Hall 3, Men's Room 2, Office 4, Beehive, and Seed Lab. In areas intermixed with White Base Adhesive.
- HA 10 :**      **MISC / NF      White Baseboard Adhesive - approx. 7,500 lf.**  
Located throughout the facility on various room walls except main core areas and Hall 1 and Storage Room 1. In areas intermixed with Yellow Base Adhesive.
- HA 11 :**      **MISC / F      HVAC Duct Seam Tape - Unquantified.**  
Located on metal HVAC Duct seams throughout plenum areas.
- HA 12 :**      **MISC / NF      Transite Panels - approx. 1,000 sf.**  
Tested in Dairy residue, Formulations, and Central Instrument Laboratory. Observed throughout the facility in Laboratory hoods.
- HA 13 :**      **MISC / NF      Mirror Mastic - Unquantified.**  
Mastic adhering mirrors to wall surfaces in all Restrooms. Observed, but inaccessible, in Women's Room #3 & #4. This material will be Assumed to be ACM until access by destructive means are used enabling material testing.

FLOOR LEVEL : 1  
FLOOR / ROOM LOCATION PLAN



PROJECT TITLE: ACM BUILDING INSPECTION

OWNER: STATE OF ARIZONA DEPARTMENT OF ADMINISTRATION

SITE: CAPITOL GROUP BUILDINGS

BUILDING: CG1-015 / 0010 RTC - AGRICULTURE LABORATORY

PROJECT #: 3297

DATE: FALL, 1998

DRAWN BY: H. LANGE

CHECKED BY: CLIENT

**ENVIRONMENTAL MANAGEMENT  
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(602) 990-2069



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## BULK SAMPLE COLLECTION FORM

RTC - AGRICULTURE LAB  
Building #: CG 1 015 - 0010

HA 01 : MATERIAL: Drywall / Drywall Compound

<u>SAMPLE #</u>	<u>SAMPLE LOCATION AND COMMENTS</u>	<u>LAB RESULTS</u>	<u>Percent</u>	<u>Type</u>
001(DW)	Storage Room 1- SW Corner- 0'E, 0'N, 0' AFF	Negative	N/A	N/A
002(Compound)	Storage Room 1- SW Corner- 0'E, 0'N, 0' AFF	Negative	N/A	N/A
003(DW)	Animal Disease Lab- NW Corner- 0'E, 0'S, 0' AFF	Negative	N/A	N/A
004(Compound)	Animal Disease Lab- NW Corner- 0'E, 0'S, 0' AFF	Negative	N/A	N/A
005(DW)	Janitor's Room 2- NE Corner- 0'W, 0'S, 0' AFF	Negative	N/A	N/A
006(Compound)	Janitor's Room 2- NE Corner- 0'W, 0'S, 0' AFF	Negative	N/A	N/A

HA 02 : MATERIAL: 2x4 Ceiling Panels

<u>SAMPLE #</u>	<u>SAMPLE LOCATION AND COMMENTS</u>	<u>LAB RESULTS</u>	<u>Percent</u>	<u>Type</u>
007	First Aid Room- NE Corner- 0'W, 0'S, 8' AFF	Negative	N/A	N/A
008	Biology Lab 1- SE Corner- 0'W, 0'N, 8' AFF	Negative	N/A	N/A
009	Women's Room 4- SW Corner- 0'E, 0'N, 8' AFF	Negative	N/A	N/A

HA 03 : MATERIAL: 1x1 Ceiling Tile / Mastic

<u>SAMPLE #</u>	<u>SAMPLE LOCATION AND COMMENTS</u>	<u>LAB RESULTS</u>	<u>Percent</u>	<u>Type</u>
010(Tile)	Hall 5- NE Corner- 0'W, 0'S, 8' AFF	Negative	N/A	N/A
011(Mastic)	Hall 5- NE Corner- 0'W, 0'S, 8' AFF	Negative	N/A	N/A
012(Tile)	Chemical Library- NW Corner- 1'E, 0'S, 8' AFF	Negative	N/A	N/A
013(Mastic)	Chemical Library- NW Corner- 1'E, 0'S, 8' AFF	Negative	N/A	N/A
014(Tile)	Reception Area- SW Corner- 2'E, 2'N, 8' AFF	Negative	N/A	N/A
015(Mastic)	Reception Area- SW Corner- 2'E, 2'N, 8' AFF	Negative	N/A	N/A

HA 04 : MATERIAL: Carpet Mastic

<u>SAMPLE #</u>	<u>SAMPLE LOCATION AND COMMENTS</u>	<u>LAB RESULTS</u>	<u>Percent</u>	<u>Type</u>
016	Conference Room- SW Corner- 0'E, 0'N, 0' AFF	Negative	N/A	N/A
017	Bee Hive- SE Corner- 0'W, 0'N, 0' AFF	Negative	N/A	N/A
018	Office 7- NW Corner- 0'E, 0'S, 0' AFF	Negative	N/A	N/A

HA 05 : MATERIAL: 12x12 Beige Floor Tile / Mastic

<u>SAMPLE #</u>	<u>SAMPLE LOCATION AND COMMENTS</u>	<u>LAB RESULTS</u>	<u>Percent</u>	<u>Type</u>
019(Tile)	Women's 2- NE Corner- 0'W, 0'S, 0' AFF	POSITIVE	05%	Chrysotile
020(Mastic)	Women's 2- NE Corner- 0'W, 0'S, 0' AFF	Negative	N/A	N/A
021(Tile)	Women's 2- SE Corner- 0'W, 0'N, 0' AFF	POSITIVE	05%	Chrysotile
022(Mastic)	Women's 2- SE Corner- 0'W, 0'N, 0' AFF	Negative	N/A	N/A
023(Tile)	Women's 2- SW Corner- 0'E, 0'N, 0' AFF	POSITIVE	05%	Chrysotile
024a/b(Mastic)	Women's 2- SW Corner- 0'E, 0'N, 0' AFF	Negative	N/A	N/A

**BULK SAMPLE COLLECTION FORM**  
(Continued)

**RTC - AGRICULTURE LAB**  
**Building #: CG 1 015 - 0010**

**HA 06 :**                      **MATERIAL:**                      12x12 White Floor Tile / Mastic

<u>SAMPLE #</u>	<u>SAMPLE LOCATION AND COMMENTS</u>	<u>LAB RESULTS</u>	<u>Percent</u>	<u>Type</u>
025(Tile)	Chemical Library- NE Corner- 0'W, 0'S, 0' AFF	Negative	N/A	N/A
026(Mastic)	Chemical Library- NE Corner- 0'W, 0'S, 0' AFF	Negative	N/A	N/A
027(Tile)	Reception Area- NW Corner- 0'E, 0'S, 0' AFF	Negative	N/A	N/A
028(Mastic)	Reception Area- NW Corner- 0'E, 0'S, 0' AFF	Negative	N/A	N/A
029(Tile)	Hall 1- SE Corner- 0'W, 0'N, 0' AFF	Negative	N/A	N/A
030(Mastic)	Hall 1- SE Corner- 0'W, 0'N, 0' AFF	Negative	N/A	N/A

**HA 07 :**                      **MATERIAL:**                      9x9 White Floor Tile / Mastic

<u>SAMPLE #</u>	<u>SAMPLE LOCATION AND COMMENTS</u>	<u>LAB RESULTS</u>	<u>Percent</u>	<u>Type</u>
031(Tile)	Women's 2- NE Corner- 0'W, 0'S, 0' AFF	POSITIVE	05%	Chrysotile
032(Mastic)	Women's 2- NE Corner- 0'W, 0'S, 0' AFF	POSITIVE	05%	Chrysotile
033(Tile)	Women's 2- NW Corner- 0'E, 0'S, 0' AFF	POSITIVE	05%	Chrysotile
034(Mastic)	Women's 2- NW Corner- 0'E, 0'S, 0' AFF	POSITIVE	05%	Chrysotile
035(Tile)	Women's 2- SE Corner- 0'W, 0'N, 0' AFF	POSITIVE	05%	Chrysotile
036(Mastic)	Women's 2- SE Corner- 0'W, 0'N, 0' AFF	POSITIVE	05%	Chrysotile

**HA 08 :**                      **MATERIAL:**                      Residual Black Mastic

<u>SAMPLE #</u>	<u>SAMPLE LOCATION AND COMMENTS</u>	<u>LAB RESULTS</u>	<u>Percent</u>	<u>Type</u>
037	Biology Lab 2- NE Corner- 0'W, 0'S, 0' AFF	POSITIVE	10%	Chrysotile
038	Biology Lab 2- NW Corner- 0'E, 0'S, 0' AFF	POSITIVE	05%	Chrysotile
039	Biology Lab 2- SW Corner- 0'E, 0'N, 0' AFF	POSITIVE	10%	Chrysotile

**HA 09 :**                      **MATERIAL:**                      Yellow Baseboard Adhesive

<u>SAMPLE #</u>	<u>SAMPLE LOCATION AND COMMENTS</u>	<u>LAB RESULTS</u>	<u>Percent</u>	<u>Type</u>
040	Storage Room 1- NE Corner- 0'W, 0'S, 0' AFF	Negative	N/A	N/A
041	Closet 2- SE Corner- 0'W, 0'N, 0' AFF	Negative	N/A	N/A
042	Hall 3- SW Corner- 0'E, 0'N, 0' AFF	Negative	N/A	N/A

**HA 10 :**                      **MATERIAL:**                      White Baseboard Adhesive

<u>SAMPLE #</u>	<u>SAMPLE LOCATION AND COMMENTS</u>	<u>LAB RESULTS</u>	<u>Percent</u>	<u>Type</u>
043	Chemical Library- NW Corner- 0'E, 0'S, 0' AFF	Negative	N/A	N/A
044	Women's Room 3- SE Corner- 0'W, 0'N, 0' AFF	Negative	N/A	N/A
045	Hall 5- SW Corner- 0'E, 0'N, 0' AFF	Negative	N/A	N/A

**BULK SAMPLE COLLECTION FORM**  
(Continued)

**RTC - AGRICULTURE LAB**  
**Building #: CG 1 015 - 0010**

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**HA 11 :**            **MATERIAL:**        Duct Tape

<u>SAMPLE #</u>	<u>SAMPLE LOCATION AND COMMENTS</u>	<u>LAB RESULTS</u>	<u>Percent</u>	<u>Type</u>
046	Ext. Electric Room- SE Corner- 10'W, 6'N, 4' AFF	Negative	N/A	N/A
047	Mycotoxin Lab- SW Corner- 10'E, 0'N, 9' AFF	Negative	N/A	N/A
048	Hall 6 Plenum- NE Corner- 0'W, 0'S, 9' AFF	Negative	N/A	N/A

**HA 12 :**            **MATERIAL:**        Transite Panels

<u>SAMPLE #</u>	<u>SAMPLE LOCATION AND COMMENTS</u>	<u>LAB RESULTS</u>	<u>Percent</u>	<u>Type</u>
049	Dairy Residue- NW Corner- 0'E, 0'S, 0' AFF	POSITIVE	15%	Chrysotile
050	Formulations Lab- NE Corner- 0'W, 0'S, 0' AFF	POSITIVE	15%	Chrysotile
051	Central Instrument Lab- NW, 0'E, 0'S, 0' AFF	POSITIVE	15%	Chrysotile

## SUMMARY OF ASBESTOS CONTAINING MATERIAL

**RTC - AGRICULTURE LAB**  
**Building #: CG 1 015 - 0010**

Based on the laboratory analysis results of samples taken at this facility during this inspection, it was determined that the following asbestos containing materials are present at this facility.

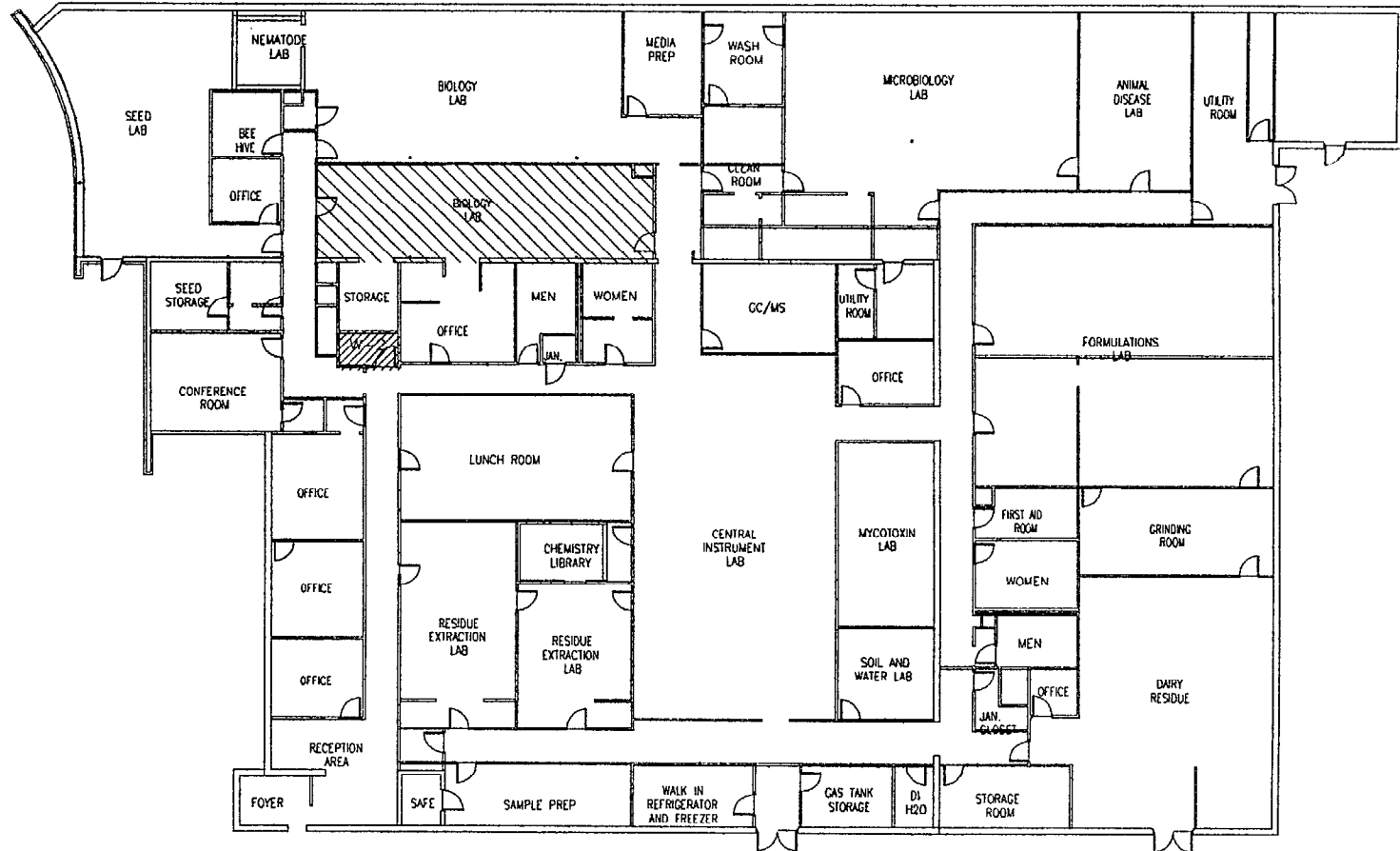
Materials are classified as friable or non-friable in their present condition. The material classification may change during renovation or demolition, see Conclusions / Recommendations.

- HA 05 :**        **MISC / NF        12x12 Beige Floor Tile (Mastic is Non-ACM) - approx. 45 sf.**  
Located in Women' s Room 2.
- HA 07 :**        **MISC / NF        9x9 White Floor Tile & Mastic - approx. 45 sf.**  
Located in Women' s Room 2, under 12x12 Beige Floor Tile.
- HA 08 :**        **MISC / NF        Residual Black Floor Mastic - approx. 900 sf.**  
Located in Bio Lab 2 under rubber membrane flooring material. Assumed under 12x12 Floor Tile in this room and under all areas / rooms where rubber membrane floor exists. Areas with rubber membrane flooring should be verified prior to renovations / removal.
- HA 12 :**        **MISC / NF        Transite Panels - approx. 1,000 sf.**  
Tested in Dairy residue, Formulations, and Central Instrument Laboratory. Observed throughout the facility in Laboratory hoods.
- HA 13 :**        **MISC / NF        Mirror Mastic - Unquantified.        (Assumed To Be ACM)**  
Mastic adhering mirrors to wall surfaces in all Restrooms. Observed, but inaccessible, in Women's Room #4. This material will be Assumed to be ACM until access by destructive means are used enabling material testing.

FLOOR LEVEL : 1

ACM LOCATION PLAN

- HA : 05 12x12 Beige Floor Tile  
HA : 07 9x9 Floor Tile & Mastic  
(Under 12x12 Floor Tile)  
HA : 08 Residual Black Floor Mastic



PROJECT TITLE: ACM BUILDING INSPECTION

OWNER: STATE OF ARIZONA DEPARTMENT OF ADMINISTRATION

SITE: CAPITOL GROUP BUILDINGS

BUILDING: CG1-015 / 0010 RTC - AGRICULTURE LABORATORY

PROJECT #: 3297

DATE: FALL, 1998

DRAWN BY: H. LANGE

CHECKED BY: CLIENT

ENVIRONMENTAL MANAGEMENT  
CONSULTANTS, INC.

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SCOTTSDALE, ARIZONA 85254  
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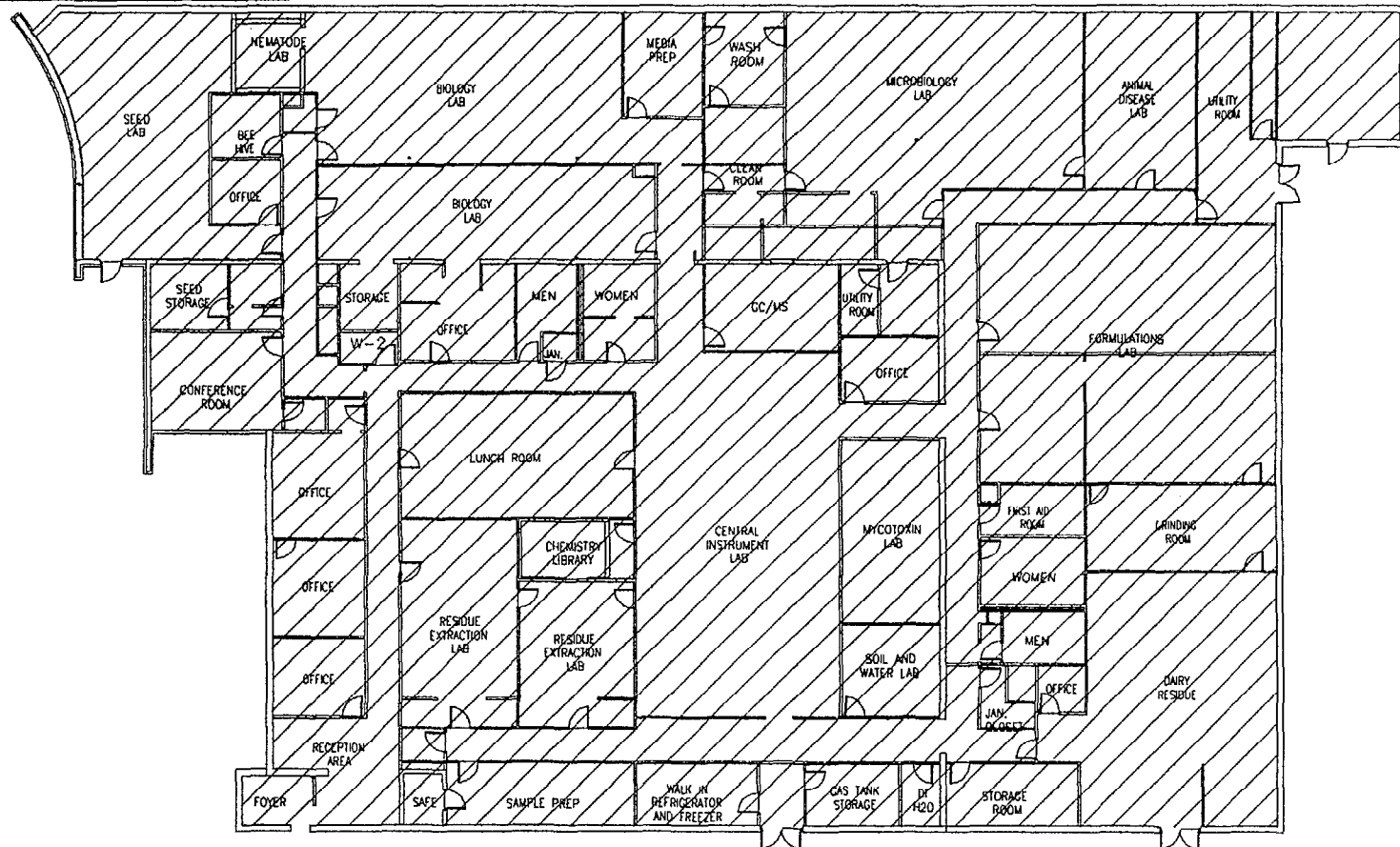
FLOOR LEVEL : 1

ACM LOCATION PLAN



HA : 12 Transite Panels

NOTE: Material is in Laboratory hoods.



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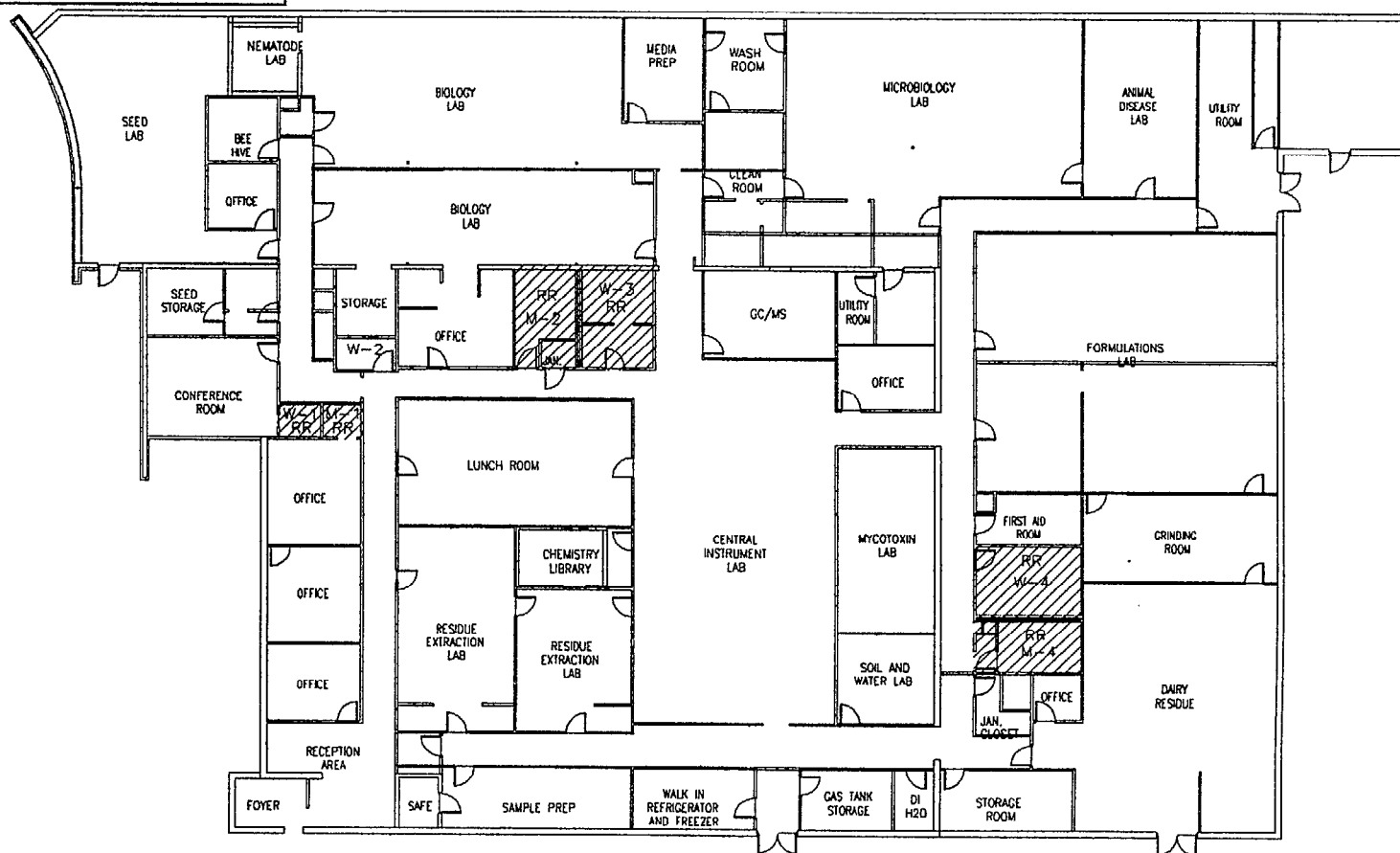
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FLOOR LEVEL : 1

ACM LOCATION PLAN

HA : 13 Mirror Mastic (Behind glass)

NOTE: This material is ASSUMED ACM until tested Non-ACM. Material is inaccessible at this time.



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3  
1  
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## CONCLUSIONS / RECOMMENDATIONS

RTC - AGRICULTURE LAB  
Building #: CG 1 015 - 0010

### FRIABLE MATERIALS :

**Conclusion:** The following materials present at this facility are considered Regulated Asbestos Containing Materials (RACM) (NESHAP - 40 CFR 61, Subpart M) in their **present condition and / or during renovation or demolition**. For removal purposes, the OSHA (29 CFR 1926.1101) material classification is given in ( ). On specific materials, OSHA regulations may have Special Procedures (S.P.) for handling, removal, etc.

Not Applicable - No RACM detected during this inspection.

### NON- FRIABLE MATERIALS :

**Conclusion:** The following materials present at this facility are considered non-friable Asbestos Containing Materials (NESHAP - 40 CFR 61, Subpart M).

#### **Category I Non-Friable Asbestos:**

12x12 Beige Floor Tile (Mastic is Non-ACM) - approx. 45 sf. (OSHA Class 2 - S. P.)  
9x9 Floor Tile & Mastic - approx. 45 sf. (OSHA Class 2 - Special Procedures)  
Black Residual Mastic - approx. 900 sf. (OSHA Class 2 - S. P.)

***Mirror Mastic - Unquantified. (OSHA Class 2 - S. P.)  
Assumed to be ACM - Inaccessible without destructive means.***

#### **Category II Non-Friable Asbestos:**

Transite Panels - approx. 1,000 sf. (OSHA Class 2)

## CONCLUSIONS / RECOMMENDATIONS:

If renovation or demolition will affect the asbestos containing material(s) found in this report, removal is recommended prior to these actions. The asbestos abatement should be performed by a licensed, insured asbestos abatement contractor.

It is important to stress that the mere presence of asbestos does not constitute a health hazard or does not mandate abatement. Removal is one of several options available in response to the presence of asbestos.

When applicable, alert occupants, outside contractors, and personnel to the locations of the ACM to prevent an accidental fiber release and/or damage to the ACM.



## **CONCLUSIONS / RECOMMENDATIONS**

(Continued)

**RTC - AGRICULTURE LAB  
Building #: CG 1 015 - 0010**

### **Materials Assumed To Be ACM:**

During this inspection, destructive means were not used to gain access to inaccessible spaces such as areas behind mirrors (**HA 13: Assumed Mirror Mastic**), duct chases, wall interiors, and areas above solid ceilings, etc. During any renovation / demolition activities, personnel should always be aware and alert for any ACM suspect material that may be hidden - HVAC Duct Seam Tape, Pipe Insulation (Hardpack), etc.

All materials not included in this report are Assumed to be asbestos containing. If renovation activities will affect suspect ACM materials that have not been tested for asbestos, additional sampling is **mandated** by federal regulations. If other suspect materials not included in this inspection are discovered, an EPA certified Building Inspector / Management Planner should be contacted to assess the material, material condition, and recommend a proper response action.

On the materials listed below, material testing was not possible during inspection - inaccessible. These material(s) will be assumed to be asbestos containing until material testing by destructive means are completed.

#### **HA 13: Mirror Mastic**

### **Recommended Response Actions:**

The facility shall implement an appropriate response action, consistent with assessments, to protect human health and the environment based on the least burdensome method.

Response Actions may include removal, encapsulation, enclosure, Operations and Maintenance (*O & M Plan*), or a combination of all options. During renovation / demolition procedures, removal of the material that will be disturbed is the only viable option. If removal occurs, air monitoring should be conducted to ensure a safe environment.

The following will list recommended response actions based on the materials condition, location, and personnel safety.

### **Response Action(s) - Undamaged Materials:**

Unless noted, all of the ACM detected at this facility was found to be fair / undamaged condition and do not pose a health concern at this time. Continue O&M procedures to maintain the friable and non-friable ACM in at least their present condition until all ACM has been removed from the facility.

Any potential for ACM material disturbance must be reduced. If damage occurs to the ACM, contact trained personnel to recommend a proper response action to correct the problem.

## **CONCLUSIONS / RECOMMENDATIONS**

(Continued)

**RTC - AGRICULTURE LAB  
Building #: CG 1 015 - 0010**

### **Other Items Recommended / Required:**

1. An Operations and Maintenance Program (O&M) shall be implemented for this facility. All activities included training, maintenance, etc. involving ACM shall follow the procedures outlined in the O&M plan.
2. Periodic inspections / surveillance of the ACM shall be completed (at least every 6 months) to determine material condition and repair of any detected damage. Maintenance and custodial staff should be made aware of the exact locations of these materials to prevent accidental fiber releases.
3. Retain all records of activities involving the ACM including minor and major abatements (if any) and any minor or major release incidents (with appropriate records) etc.
4. Employee training - 2 Hour awareness and 16 hour Operations and Maintenance (O&M) training is required. Records of maintenance / custodial personnel who have received the required training should be retained for ready reference.

**INSPECTOR / LABORATORY CERTIFICATIONS**

**RTC - AGRICULTURE LAB  
Building #: CG 1 015 - 0010**

This is a statement of assurance that the people involved in this inspection and report have attended and successfully completed formal EPA approved courses for AHERA Building Inspector / Management Planner.

All samples collected from this facility were processed in accordance with AHERA's Final Rule and Notice Part II Federal Register regarding ACM in schools (See EPA 40 CFR Part 763.86, 763.87 and 763.88 - Sampling, analysis and assessment.)

Analysis was performed by Environmental Management Consultants, Inc. laboratory located at 7342 East Thomas Road, Scottsdale, Arizona 85251, under NVLAP accreditation number 1926, using Polarized Light Microscopy (PLM).

The following personnel participated in the analysis of these bulk samples:

Primary Analyst(s):	Jason Sutter
Q.C. Analyst(s):	Kenneth Scheske
Laboratory Director:	Kurt Kettler